

UNITED STATES DISTRICT COURT
THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:23-CR-78-RJJ

vs.

GOVERNMENT'S INITIAL PRETRIAL
CONFERENCE SUMMARY STATEMENT

SEANN PATRICK PIETILA,

Defendant. /

I. DISCOVERY

A. Statements of Defendant

1. Oral Statements [Rule 16(a)(1)(A)]

☐ There are no written records of oral statements or other oral statements as defined in Rule 16(a)(1)(A).

☒ There are the following written records of oral statements:

- FBI summary of videorecorded interview on 6/16/2023

the substance of which:

☐ has been disclosed to defense counsel

☒ will be disclosed to defense counsel by July 13, 2023

2. Written or Recorded Statements [Rule 16(a)(1)(B)]

☐ There are no written or recorded statements or grand jury testimony of defendant.

☒ There are the following written or recorded statements or grand jury testimony:

- Videorecording of interview on 6/16/2023

All written or recorded statements:

☒ have been disclosed to defense counsel

☐ will be disclosed to defense counsel by

B. Defendant's Prior Record [Rule 16(a)(1)(D)]

☒ The government has made due inquiry and is not aware of any prior criminal record.

☐ The government has disclosed defendant's prior criminal history.

☐ The government is now making inquiry into defendant's prior criminal history.
The results will be disclosed to defense counsel upon receipt.

C. Documents and Tangible Objects [Rule 16(a)(1)(E)]

- ☐ The government has no documents, tangible objects, or physical evidence required to be disclosed.
- ☒ The government has the following documents, tangible objects, and physical evidence:
 - ☐ Controlled Substances:
 - ☐ Drug Paraphernalia:
 - ☒ Records: Business records from various companies
 - ☐ Drug Records:
 - ☒ Firearms: (see attached inventory)
 - ☒ Inventory: (see attached)
 - ☐ Other:
- ☐ The government voluntarily notifies the defendant of the following search warrants issued and the warrant returns:
 - ☐ State
 - ☒ Federal: 2:23-MJ-25 (phone location); 2:23-MJ-27 (premises); 2:23-MJ-28 (person)
- ☒ They have been made available for inspection and copying by defense counsel.
- ☒ Defense counsel should make arrangements with AUSA Chris O'Connor to view tangible items seized from residence.

D. Reports of Examinations and Tests [Rule 16(a)(1)(F)]

- ☐ The government has no reports of examinations or tests required to be disclosed by Rule 16.
- ☒ The government has or expects to have reports of the following examinations and tests:

<input type="checkbox"/> Drug Analysis	<input type="checkbox"/> Handwriting	<input type="checkbox"/> Fingerprints
<input type="checkbox"/> DNA	<input type="checkbox"/> Firearms/Nexus	<input type="checkbox"/> Gun Operability
<input checked="" type="checkbox"/> Computer Forensics		<input type="checkbox"/> Other

E. Reciprocal Discovery

- ☒ The government seeks reciprocal discovery.

F. Notice Under FRE 404(b)

- ☒ The government does not presently intend to introduce 404(b) evidence.
- ☐ The government does presently intend to introduce the following 404(b) evidence:
- ☐ The government will provide pretrial notice of 404(b) evidence by

G. Other Discovery Matters:

II. TRIAL

- A. The government requests a ☒ jury ☐ non-jury trial.
- B. Length of trial excluding jury selection is estimated at two days

III. MISCELLANEOUS

The parties acknowledge that if the case is appropriate for expedited resolution, a joint motion for expedited sentencing shall be filed within 14 days of arraignment.

- ☒ The government is unaware at this time of any known conflict with defendant's representation by counsel. The United States will immediately advise counsel if any such conflict becomes known.
- ☐ The government is aware of the following potential conflict(s):
- ☒ Government's plea negotiation policy: No concessions within 2 weeks of trial date

Date: July 12, 2023

s/ Christopher M. O'Connor
Assistant United States Attorney